

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE AMERICAN INTERNATIONAL
GROUP, INC. SECURITIES LITIGATION

This Document Relates To: All Actions

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ECF CASE

Master File No. 04 Civ. 8141 (DAB) (AJP)

Oral Argument Requested

**NOTICE OF LEAD COUNSEL'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES AND
LEAD PLAINTIFF'S REQUEST FOR REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 23(h) and 54(d)(2), Labaton Sucharow LLP and Hahn Loeser & Parks LLP, Court-appointed Lead Counsel, will move the Court on January 31, 2012, at 11:00 a.m., before the Honorable Deborah A. Batts, at the U.S. Courthouse, 500 Pearl Street, New York, NY 10007 for an order: (a) awarding attorneys' fees; (b) reimbursing litigation expenses incurred by counsel; and (c) reimbursing the Ohio Public Employees Retirement System and State Teachers Retirement System of Ohio for their reasonable costs and expenses directly relating to the representation of the Class, pursuant to the Private Securities Litigation Reform Act ("PSLRA"), 15 U.S.C. §78u-4 (a)(4).

PLEASE TAKE FURTHER NOTICE that in support of the motion, Lead Counsel submits and is filing herewith: the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses and Lead Plaintiff's Request for Reimbursement of Expenses, dated December 2, 2011, and the Declaration of Thomas A. Dubbs in Support of Proposed Class Settlement, Plan of Allocation and Award of Attorneys' Fees and

